

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE

DANIEL P ORRISON AND
LINDA M ORRISON,

Debtors

BRIDGESTONE ACCEPTANCE
CORPORATION,

Movant

VS.

DANIEL P ORRISON AND
LINDA M ORRISON,

Respondent(s)

and

KENNETH E. WEST

Trustee

CHAPTER 13

CASE NO.: 24-10125-PMM

HEARING DATE:

Thursday, June 13, 2024
11:00 A.M.

LOCATION:

900 Market Street, Suite 400
Courtroom No. 1
Philadelphia, PA 19107

MOTION FOR RELIEF FROM AUTOMATIC STAY

AND NOW, comes the above-captioned Movant, Bridgecrest Acceptance Corporation, by and through their attorney, Regina Cohen, who files this Motion based upon the following:

1. The Movant is a corporation having a principal place of business located at 7457 E. Hampton Ave., Mesa, AZ 85209.

2. The Respondents, Daniel P Orrison and Linda M Orrison are an individual with a mailing address at 439 W. Bristol Road, Trevoze, PA 19053, who have filed a Petition on January 16, 2024 under Chapter 13 of the Bankruptcy Code.

3. On or about November 04, 2022, Debtors Daniel P Orrison and Linda M Orrison entered into a Retail Installment Sales Contract, involving a loan in the amount of \$26,279.95 for the purchase of a 2018 Dodge Journey Utility 4D SE 2.4L I4.

4. The vehicle secured by the Contract has V.I.N. 3C4PDCAB9JT444440.

5. Movant is the assignee of the Contract.

6. The above – described vehicle is encumbered by a lien with a payoff in the amount of \$25,297.05 plus other appropriate charges as of May 09, 2024 but subject to change. The regular monthly payment is \$605.69 at an interest rate of 18.23%.

7. Applying payments received to the earliest payment due, payments have been missed post-petition, since February 14, 2024 in the amount of \$1,817.07, plus all applicable late charges, interest, attorneys' fees and costs.

8. The Property has a N.A.D.A. Value of \$10,725.00.

9. The vehicle is not necessary to an effective reorganization.

10. The Movant is the only lienholder of record with regard to the vehicle.

11. Failure to make adequate protection payments is cause for relief from the automatic stay.

12. The Movant has incurred attorney's fees in the filing of this Motion.

13. The vehicle is a rapidly depreciating asset. Movant requests the waiver of Rule 4001(a)(3).

WHEREFORE, Movant prays for your Honorable Court to enter an Order permitting the Movant to proceed with the repossession proceedings of the aforementioned vehicle.

Respectfully submitted,
Lavin, Cedrone, Graver, Boyd & DiSipio

/s/ Regina Cohen
Regina Cohen
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